

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**NATIONAL RIFLE ASSOCIATION OF
AMERICA,**

Plaintiff and Counter-Defendant,

and

WAYNE LAPIERRE,

Third-Party Defendant,

V.

ACKERMAN MCQUEEN, INC.,

Defendant and Counter-Plaintiff,

and

**MERCURY GROUP, INC., HENRY
MARTIN, WILLIAM WINKLER,
MELANIE MONTGOMERY,**

Defendants.

Civil Action No. 3:19-cv-02074-G

PLAINTIFF'S AND THIRD-PARTY DEFENDANT'S JOINT MOTION
TO EXTEND THE DISPOSITIVE MOTION DEADLINE

Plaintiff and Counter-Defendant National Rifle Association of America (“NRA”) and Third-Party Defendant Wayne LaPierre (“LaPierre”) submit the following Joint Motion to Extend the Dispositive Motion Deadline. In support, the NRA and LaPierre show as follows:

1. Pursuant to the Court's May 14, 2021 Order, all dispositive motions (including summary judgment motions) are currently due July 6, 2021.
2. The May 14, 2021 Order also set the close of discovery on August 6, 2021.

3. Discovery remains ongoing. The parties are still in the process of responding to each other's discovery requests. Multiple depositions are scheduled prior to the August 6, 2021, deadline for the close of fact discovery, with several others yet to be scheduled.

4. As shown above, the current dispositive motion deadline of July 6, 2021, precedes the end of discovery by one month. That deadline also precedes the deadline for reply briefing for LaPierre's motion to dismiss Defendant Ackerman McQueen, Inc.'s third-party claims against him, as well as the NRA's deadline for reply briefing for its motion to dismiss Defendants' counterclaims against it. The current dispositive motion deadline would certainly precede the Court's disposition of both motions to dismiss.

5. Plaintiff and LaPierre respectfully request the deadline for dispositive motions be extended to August 27, 2021.

6. A Proposed Order granting the requested relief is submitted alongside this Motion.

Dated: July 6, 2021

Respectfully Submitted,

BREWER, ATTORNEYS & COUNSELORS

By: /s/ Jason F. Clouser
Jason F. Clouser, Esq.
State Bar No. 24111395
jfc@brewerattorneys.com
Philip J. Furia, Esq.
Admitted *Pro Hac Vice*
pjf@brewerattorneys.com
1717 Main St. Suite 5900
Dallas, Texas 75201
Telephone: (214) 653-4000
Facsimile: (214) 653-1015

**ATTORNEYS FOR PLAINTIFF AND
COUNTER-DEFENDANT THE
NATIONAL RIFLE ASSOCIATION
OF AMERICA**

CORRELL LAW GROUP

By: /s/ P. Kent Correll

P. Kent Correll
NY State Bar No. 1809219
250 Park Avenue, 7th Floor
New York, New York 10177
Tel: (212) 475-3070
Fax: (212) 409-8515
E-mail: kent@correlllawgroup.com

***Attorney for Third-Party
Defendant Wayne LaPierre***

CERTIFICATE OF CONFERENCE

I hereby certify that on July 6, 2021, my office conferred with all counsel of record via email. Counsel for Defendants stated that they are opposed to the relief requested in this motion.

 /s/ Jason F. Clouser
Jason F. Clouser

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was electronically served via the Court's electronic case filing system upon all counsel of record on this 6th day of July 2021.

 /s/ Jason F. Clouser
Jason F. Clouser